

RABINOWITZ, LUBETKIN & TULLY, LLC

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Jeffrey A. Cooper

Counsel for Honeywell International Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

POWIN, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

**SUPPLEMENTAL JOINDER OF HONEYWELL INTERNATIONAL INC. TO
EMERGENCY MOTION OF AD HOC CUSTOMER GROUP FOR ENTRY OF AN
ORDER (I) GRANTING ADEQUATE PROTECTION UNDER § 363(e) OF THE
BANKRUPTCY CODE; AND (II) GRANTING RELATED RELIEF**

Honeywell International Inc. (“Honeywell”), by and through its undersigned counsel, hereby files this supplemental joinder (the “Supplemental Joinder”) to the *Emergency Motion of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under § 363(e) of the Bankruptcy Code; and (II) Granting Related Relief* [Docket No. 297] (the “Emergency Motion”)² filed by the Ad Hoc Customer Group.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; and (ix) Powin Energy Operating, LLC [6487]. The Debtors’ mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

² Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Emergency Motion.

Honeywell files this Supplemental Joinder to supplement its previously filed Joinder [Docket No. 292] and fully incorporates that joinder in this pleading.

By filing this Supplemental Joinder, specifically adopts and incorporates by reference, to the extent applicable, the legal arguments in support of the relief requested in the various objections/joinders, including the immediate relief requested with regard to § 365(n)(4) with regard to current performance, as well as 363(e) with regard to the immediate provision of adequate protection.

Respectfully submitted,

RABINOWITZ, LUBETKIN & TULLY, LLC
Counsel for Honeywell International Inc.

By: /s/ Jeffrey A. Cooper
JEFFREY A. COOPER

Dated: July 11, 2025

Respectfully submitted,

ADAMS & REESE, LLP
Counsel for Honeywell International Inc.
(Pro Hac Vice Pending)

By: /s/ Scott Cheatham
SCOTT CHEATHAM

Dated: July 11, 2025